<u>REMARKS</u>

I.   <u>Introduction</u>

Claims 1-89 are pending in the present application. In the December 27, 2005, Office Action (herein "Office Action"), Claims 1-7, 13, 22-25 were rejected under 35 U.S.C. § 102(e) as being anticipated by U.S. PG Pub. No. 2002/0082956 to Peterson et al. (herein "Peterson"). Claims 8-12 and 14-21 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Peterson in view of U.S. PG Pub. 2002/0173996 to Murch et al. (herein "Murch"). Claims 26-89 were rejected under the same rationale as Claims 1-25.

II.   <u>Claim Rejections</u>

    A.   <u>35 U.S.C. § 102(e) and 35 U.S.C. § 103(a) Rejections</u>

        1.   <u>Introduction</u>

Claims 1-7, 13, 22-25 were rejected under 35 U.S.C. § 102(e) as being anticipated by Peterson. Claims 8-12 and 14-21 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Peterson in view of U.S. PG Pub. 2002/0173996 to Murch et al. (herein "Murch"). Claims 26-89 were rejected under the same rationale as Claims 1-25. Applicants respectfully submit that the rejected claims of the present application are not anticipated nor obvious over the cited and applied references because Peterson fails to teach or suggest a method and system for processing available inventory item queries and inventory action requests corresponding to inventory items defined by stock-keeping unit (SKU) information, the SKU information including at least two levels of detail. Peterson further fails to teach or suggest a first level detail corresponding to a type of inventory and a second level of detail corresponding to an instance of the type of inventory item identified in the first level of detail. Prior to discussing more detailed reasons why applicants believe that all the claims of the present invention are allowable, a brief description of the present invention and the primary cited reference are presented.

a.   Summary of the Present Invention

The present invention is generally related to a method and system for managing inventory item queries and reservation requests for a variety of inventory items. More specifically, the present invention is related to a method and system for processing available inventory item queries and inventory action requests corresponding to inventory items defined by stock-keeping unit (SKU) information. The SKU information includes at least one SKU record defining a first, or primary, level of detail for the inventory item, and a SKU inventory record corresponding to the SKU record and defining a second level of detail for the inventory items. Further, the first level of detail includes information corresponding to a specific type of inventory item and the second level of detail includes information corresponding to an instance of the type of inventory item identified in the first level of detail.

In one example of the present invention, the system includes a client computing device, a travel server, and an inventory store. The client computing device and the travel server may be connected via the Internet. If a user at the client computing device wishes to query the travel server for available inventory, such as available airline flights, the user query is transmitted from the client computing device to the travel server over the Internet. The travel server issues a query to the inventory store which returns inventory item data that matches the query criteria. At least two levels of detail are defined in the inventory item data, an SKU record and an SKU inventory record. The travel server transmits the results of the query to the client computing device.

Thus, the present invention provides the ability to manage inventory item queries and inventory action requests for a variety of inventory items.

b.   U.S. PG Pub. No. 2002/0082956 to Peterson et al.

Peterson is purportedly directed toward a process for integrating a maintenance supply network with an information network for selectively distributing information about inventory. *See* Peterson, paragraph 0004. Peterson teaches that inventory information can include an item number, the quantity of an item, and possibly the price of an item. Paragraphs 0190-0197. Thus, Peterson teaches that inventory can be associated with various attributes, such as an item number, quantity, and price.

Clearly Peterson fails to teach or suggest a method and system for processing available inventory item queries and inventory action requests corresponding to inventory items defined by stock-keeping unit (SKU) information, the SKU information including at least two levels of detail. Peterson further fails to teach or suggest a first level detail corresponding to a type of inventory and a second level of detail corresponding to an instance of the type of inventory item identified in the first level of detail.

2.   The Claims Distinguished

a.   Claim 1

Claim 1, as currently amended, reads as follows:

> 1.   A method implemented in a computer device for processing an available inventory item query corresponding to inventory defined by stock-keeping unit (SKU) information, the SKU information including at least one SKU record defining a first level of detail for the inventory item, and a SKU inventory record corresponding to the SKU record and defining a second level of detail for the inventory items, the method comprising:
>
> obtaining, by the computer device, an available inventory query, the query including a set of criteria;
>
> determining at least one inventory item matching the query criteria, the inventory item corresponding to at least one SKU and SKU inventory record, wherein the at least one SKU record includes information corresponding to a type of inventory item, and wherein the at least one SKU inventory record includes

information corresponding to an instance of the type of inventory item identified in the SKU record; and

transmitting data associated with the matching SKU and SKU inventory records.

As described above, Claim 1 recites a method "for processing an available inventory item query corresponding to inventory defined by stock-keeping unit (SKU) information." Claim 1 further recites that the SKU information includes "at least one SKU record defining a first level of detail for an inventory item." Still further, Claim 1 recites that the "SKU record includes information corresponding to a type of inventory item." As recited in Claim 1, the SKU information also includes an "SKU inventory record corresponding to the SKU record and defining a second level of detail for the inventory items." Claim 1 further recites that the "SKU inventory record includes information corresponding to an instance of the type of inventory item identified in the SKU record." Thus, Claim 1 recites SKU information which includes at least one SKU record and an SKU inventory record. The at least one SKU record defines a first level of detail for an inventory item and includes information corresponding to a specific type of inventory item. The SKU inventory record defines a second level of detail for the inventory items and includes information corresponding to an instance of the type of inventory item identified in the first level of detail.

In contrast to the present application, Peterson is purportedly directed toward a process for integrating a maintenance supply network with an information network for selectively distributing information about inventory. *See* Peterson, paragraph 0004. Peterson teaches that inventory information can include an item number, the quantity of an item, and possibly the price of an item. Paragraphs 0190-0197. Thus, Peterson teaches that inventory can be associated with various attributes, such as an item number, quantity, and price.

However, Peterson clearly does not teach or suggest inventory information defined by multiple levels of detail. Further, Peterson does not teach or suggest a first level of inventory

EXIN\17646AM9.DOC

detail which includes information corresponding to a specific type of inventory item. Still further, Peterson does not teach or suggest a second level of inventory detail which includes information corresponding to an instance of the type of inventory item identified in the first level of detail. Instead, Peterson merely teaches inventory attributes, such as price, quantity, and item number. The inventory attributes taught in Peterson clearly do not correspond to a hierarchical type-instance relationship.

To anticipate a claim under § 102(e), the cited reference must teach each and every element recited in the claim. *Verdegaal Bros. v. Union Oil Co. of California*, 814 F.2d 628, 631 (Fed. Cir. 1987). With regard to Claim 1, applicant respectfully submits that the cited reference, Peterson, fails to teach at least a "determining at least one inventory item matching the query criteria, the inventory item corresponding to at least one SKU and SKU inventory record, wherein the at least one SKU record includes information corresponding to a type of inventory item, and wherein the at least one SKU inventory record includes information corresponding to an instance of the type of inventory item identified in the SKU record" as recited in the claim. For these reasons, applicant respectfully requests a withdrawal of the § 102(e) rejection with regard to Claim 1 and allowance of the claim.

b.   <u>Claims 2-25</u>

Claims 2-25 are dependent on Claim 1. As discussed above, Peterson fails to teach or suggest all of the limitations recited with regard to Claim 1. Accordingly, for the above-mentioned reasons, Claims 2-25 are allowable over the cited art. In addition, Claims 2-25 further add to the patentability and nonobviousness of applicant's invention. For these reasons, applicants respectfully request withdrawal of the § 102(e) and 103(a) rejections with regard to Claims 2-25 and allowance of the claims.

c.   <u>Claims 26-89</u>

The Office Action asserts that Claims 26-89 disclose the same inventive concept as Claims 1-25. See Office Action, p. 7. Thus, the Office Action asserts that Claims 26-89 are rejected under the same rationale as Claims 1-25. *Id.* As discussed above, Peterson fails to teach or suggest all of the limitations recited with regard to Claim 1. Claims 2-25 are dependent on allowable Claim 1. Thus, Peterson further fails to teach or suggest all of the limitations recited with regard to Claims 2-25. Because Peterson fails to teach or suggest all of the limitations recited with regard to Claims 1-25, under the Office Action's rationale, Peterson likewise fails to teach or suggest all of the limitations recited with regard to Claims 26-89. Accordingly, for the above-mentioned reasons, Claims 26-89 are allowable over Peterson. Applicants further assert the arguments below in regards to Claims 26-89.

Claim 26, as currently amended, reads as follows:

26.   A method implemented by a computer device for processing an inventory action request corresponding to one or more inventory items defined by stock-keeping unit (SKU) information, the SKU information including at least one SKU record defining a primary level of detail for the inventory item, wherein the primary level of detail includes information corresponding to a type of inventory item, and a SKU inventory record corresponding to the SKU record and defining a second level of detail for the inventory items, wherein the second level of detail includes information corresponding to an instance of the type of inventory item identified in the primary level of detail, the method comprising:

obtaining, by the computer device, an inventory action request, the inventory action request including an identification of at least one specific SKU and SKU inventory record;

processing the inventory action request; and

transmitting the results of the processing of the inventory action request.

Clearly, Peterson does not teach or suggest a method "implemented by a computer device for processing an inventory action request corresponding to one or more inventory items defined by stock-keeping unit (SKU) information, the SKU information including at least one SKU record defining a primary level of detail for the inventory item, wherein the primary level of detail includes information corresponding to a type of inventory item, and a SKU inventory record corresponding to the SKU record and defining a second level of detail for the inventory items, wherein the second level of detail includes information corresponding to an instance of the type of inventory item identified in the primary level of detail" as recited in Claim 26.

Claim 44, as currently amended, reads as follows:

44.   A   computer-readable   medium   having , computer-readable components for managing one or more inventory items comprising:

an SKU component operable to define a first level of characteristics for one or more inventory items, wherein the first level of characteristics includes information corresponding to a type of inventory item; and

an SKU inventory component corresponding to the SKU component and operable to define a second level of characteristics for an inventory item, wherein the second level of characteristics includes information corresponding to an instance of the type of inventory item identified in the first level of characteristics.

Clearly, Peterson does not teach or suggest a computer-readable medium including an "SKU component operable to define a first level of characteristics for one or more inventory items, wherein the first level of characteristics includes information corresponding to a type of inventory item" as recited in Claim 44. Nor does Peterson teach Claim 44's limitation of "an SKU inventory component corresponding to the SKU component and operable to define a second level of characteristics for an inventory item, wherein the second level of characteristics

-21-

EXIN\17646AM9.DOC

includes information corresponding to an instance of the type of inventory item identified in the first level of characteristics."

Claim 72, as currently amended, reads as follows:

> 72.   A system for managing inventory utilizing stock-keeping unit (SKU) information, the SKU information including at least one SKU record defining a primary level of detail for the inventory item, wherein the primary level of detail includes information corresponding to a type of inventory item, and a SKU inventory record corresponding to the SKU record and defining a second level of detail for the inventory items, wherein the second level of detail includes information corresponding to an instance of the type of inventory item identified in the primary level of detail, the system comprising:
>
> at least one client computing device operable to issue an inventory query, the query including a set of criteria;
>
> a travel server operable to store one or more inventory items defined by SKU and SKU inventory records; and
>
> wherein the travel server is operable to identify one or more SKU and SKU inventory records matching the inventory query criteria submitted by the client computing device.

Clearly, Peterson does not teach or suggest a "system for managing inventory utilizing stock-keeping unit (SKU) information, the SKU information including at least one SKU record defining a primary level of detail for the inventory item, wherein the primary level of detail includes information corresponding to a type of inventory item, and a SKU inventory record corresponding to the SKU record and defining a second level of detail for the inventory items, wherein the second level of detail includes information corresponding to an instance of the type of inventory item identified in the primary level of detail" as recited in Claim 72.

Claim 82, as currently amended, reads as follows:

> 82.   A system for managing one or more inventory items utilizing stock-keeping unit (SKU) information, the SKU information including at least one SKU record defining a primary level of detail for the inventory item, wherein the primary level of detail includes information corresponding to a type of inventory item, and a SKU inventory record corresponding to the SKU record and defining a second level of detail for the inventory items, wherein the second level

EXIN\17646AM9.DOC

of detail includes information corresponding to an instance of the type of inventory item identified in the primary level of detail, the system comprising:

at least one inventory supplier operable to provide the one or more inventory items;

a travel server operable to store the supplier inventory items as SKU and SKU inventory records; and

wherein the travel server is operable to communicate with the inventory suppliers and process inventory action requests corresponding to the SKU and SKU inventory records.

Clearly, Peterson does not teach or suggest a "system for managing one or more inventory items utilizing stock-keeping unit (SKU) information, the SKU information including at least one SKU record defining a primary level of detail for the inventory item, wherein the primary level of detail includes information corresponding to a type of inventory item, and a SKU inventory record corresponding to the SKU record and defining a second level of detail for the inventory items, wherein the second level of detail includes information corresponding to an instance of the type of inventory item identified in the primary level of detail" as recited in Claim 82.

Claims 27-43 are dependent on Claim 26, Claims 45-71 are dependent on Claim 44, Claims 73-81 are dependent on Claim 72, and Claims 83-89 are dependent on Claim 82. As discussed above, Peterson fails to teach or suggest each of the limitations respectively recited in Claims 26, 44, 72, and 82. Accordingly, for the above-mentioned reasons, Claims 27-43, 45-71, 73-81, and 83-89 are likewise allowable over Peterson. In addition, Claims 27-43, 45-71, 73-81, and 83-89 further add to the patentability and nonobviousness of the claims.

With regard to Claims 26-89, applicants respectfully submit that Peterson fails to teach or suggest each and every element recited in the respective claims. For these reasons, applicant respectfully requests a withdrawal of the § 102(e) and § 103(a) rejections with regard to Claims 26-89 and allowance of the claims.
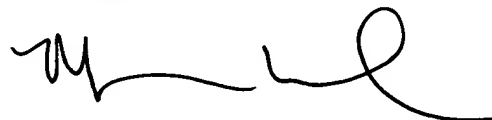
EXIN\17646AM9.DOC

CONCLUSION

Based on the above-referenced arguments and amendments, applicants respectfully submit that all of the pending claims of the present application, Claims 1-89, are allowable over Peterson. Because Peterson fails to teach or suggest a method implemented in a computer device for processing an available inventory item query corresponding to inventory defined by stock-keeping unit (SKU) information, the SKU information including at least one SKU record defining a first level of detail for the inventory item, wherein the first level of detail includes information corresponding to a specific type of inventory item, and a SKU inventory record corresponding to the SKU record and defining a second level of detail for the inventory items, wherein the second level of detail includes information corresponding to an instance of the type of inventory item identified in the first level of detail, applicants respectfully request withdrawal of the rejections of the claims and allowance of the present application.

If any questions remain, applicants request that the Examiner contact the undersigned at the telephone number listed below.
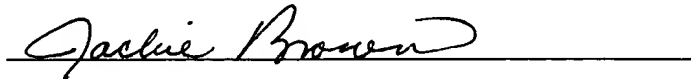
Respectfully submitted,

CHRISTENSEN O'CONNOR
JOHNSON KINDNESS^{PLLC}

Mauricio A. Uribe
Registration No. 46,206
Direct Dial No. 206.695.1728

I hereby certify that this correspondence is being deposited with the U.S. Postal Service in a sealed envelope as first class mail with postage thereon fully prepaid and addressed to Mail Stop Amendment, Commissioner for Patents, P.O. Box 1450, Alexandria, VA 22313-1450, on the below date.

Date: _____5/30/06_____

MAU:jlb

LAW OFFICES OF
CHRISTENSEN O'CONNOR JOHNSON KINDNESS^{PLLC}
1420 Fifth Avenue
Suite 2800
Seattle, Washington 98101
206.682.8100

-24-

EXIN\17646AM9.DOC